



WRRR
25,000 WATTS

93.9 FM WRRR ST. MARYS
93.9 FM WRRR-1 NEW MARTINSVILLE

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AUG 23 1995

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

August 19, 1995

Secretary
F.C.C.
1919 M St. NW
Washington, D.C. 20554

RE: MM Docket No. 95-113, RM 8664
Salem, W.V.

Dear Sir:

Enclosed please find the original and four copies of the counter-proposal of Seven Ranges Radio Co. Inc. (DBA WRRR-FM) in this proceeding.

I may be reached at this address, or by telephone at area code 614, 797-2523.

Sincerely yours,

Thomas P. Taggart
Attorney for
Seven Ranges Radio

No. of Copies rec'd
List A B C D E

0 + 4

WRRR
P.O. Box 374 • Greens Run Road
St. Marys, WV 26170
(304) 684-3400

WRRR-1
P.O. Box 564
New Martinsville, WV 26155

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D C

In the Matter of:

Amendment of Sec. 73.202 (B);

FM Table of Allocations; Salem, W.V.

MM Docket No. 95-113

RM 8664

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AUG 23 1995

FCC MAIL ROOM

COUNTER-PROPOSAL OF SEVEN RANGES RADIO COMPANY, INC.

1. The Commission has before it a proposal of Salem-Teikyo University to assign Channel 258A, 99.5 MHZ.; to Salem, W.V. as its second local FM transmission service. Seven Ranges Radio Company, Inc., a West Virginia corporation with its principal business office at Saint Marys, W.V. now appears to propose the following counter proposals in the alternative:

A. Substitute Channel 277A (103.3 Mhz.) for Channel 258A (99.5 Mhz.) as proposed at Salem, and assign Channel 258A to New Martinsville, W.V.; or

B. Assign Channel 258A to New Martinsville instead of to Salem, if there is no other allotment available at Salem

If Channel 258A is allotted to New Martinsville, Seven Ranges will promptly apply for permission to build a station at New Martinsville

2. Table I demonstrates that Channel 277A can be assigned to Salem, W.V. at the reference coordinates while meeting all minimum distance requirements. Table II demonstrates that Channel 258A can be assigned to New Martinsville, W.V. while also meeting all minimum distance requirements. The reference coordinates are for the New Martinsville Post Office.

DISCUSSION

2. Salem is a small village of 2,063 in Harrison County (pop. 79,000), W.V. Station WOBG-FM is presently licensed to Salem, operating as a Class A station on Channel 289A, 105.7 Mhz.; as noted, this proposal will be for a second allotment. Apart from Salem-Teikyo, a small

liberal arts college, Salem has little other significance than as a bedroom community to the county seat of Clarksburg, (pop. 18,059). There are six other commercial FM stations, and three AM stations licensed to communities in Harrison County: while a full facility Class A FM station at the reference coordinates proposed would appear to have a city grade contour overlap with 11 other radio stations, (see Table III)

3. By contrast, New Martinsville (6,705) is the county seat of Wetzel County (26,000). It has a daytime AM (WETZ) and Class A FM (WNMR) licensed to it, and there is a weekly newspaper published there. The city is a small retail center for neighboring Tyler County, W.V., (11,000) and Monroe County, Oh. (15,000). Besides the Magnolia local school district in the city, there is a local junior college, Northern W.V. Community College. The city of New Martinsville has two shopping plazas, while a regional department store has announced plans to re-open a third, small plaza. Employment is provided by several large plants, including Ormet and Consolidated Aluminum, Bayer A.G. and Mobay Inc. (chemicals); and a local glass plant.

4. A full facility FM station at the reference coordinates for New Martinsville would have city-grade contour overlap with just five FM stations, and two AM stations (WETZ, and WWVA, Wheeling). The Petitioner's WRRR-FM provides some service to New Martinsville with a low power FM booster, WRRR-FM-1. See Table IV

ARGUMENT

5. If the Counter-proposal of Seven Ranges is adopted, both communities can be allotted a second local FM transmission service. However, if for some reason Channel 277A cannot be allotted to Salem; then Channel 258A should be allotted to New Martinsville instead of to Salem.

6. Allotment of Channel 258A to Salem will add a twelfth voice to the Clarksburg radio market. It will be the seventh commercial FM channel in the county. By way of contrast, if Channel 258A is assigned to New Martinsville, it will be just the second, full-time aural service licensed to the city of New Martinsville, and to Wetzel County. While it will be the eighth voice in

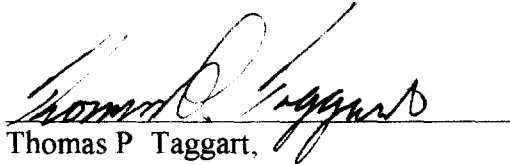
the radio market (as defined by Sec. 73.3555) five of those stations are licensed to the Wheeling market, and do not program for Wetzel County on a regular basis.

CONCLUSION

7. The public interest is best served by adopting the first counter-proposal of Seven Ranges Radio. This will provide a second FM transmission service to both New Martinsville, W.V. with Channel 258A (99.5 MHZ.) and Salem, W V with Channel 277A (103.3 MHZ.).

8. If Channel 277A cannot be allotted to Salem, then the public interest is best served by allotting Channel 258A to New Martinsville rather than to Salem, as that larger city's second FM transmission service.

Respectfully submitted by

A handwritten signature in black ink, appearing to read "Thomas P. Taggart", is written over a horizontal line.

Thomas P. Taggart,
Director and Attorney for
Seven Ranges Radio Co. Inc.
P.O. Box 374, Greens Run Rd.
Saint Marys, W.V. 26170
Tel (614) 797-2523

TABLE I

Reference Coordinates for Salem, W.V.: 39-17-00; 80-34-00

Co-Channel: 103.3 MHZ, Ch. 277

	Actual	Required	Class of Station
WTCR, Huntington, W.V	185.88 Km.	178 Km.	B
WAKG, Danville, Va.	301.39 Km.	226 Km.	C
(NEW), Brookville, Pa.	241.31 Km	143 Km.	B-1*

First Adjacent Channels: 103.1 MHZ., Ch. 276

WXKX, Parkersburg, W.V	86.37 Km	72 Km	A
WANB, Waynesburg, W.V	75.11 Km	72 Km	A

103.5 MHZ., Ch. 278

WRKY, Steubenville, Oh.	117.97 Km	113 Km.	B
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Second Adjacent Channels: 102.9 MHZ., Ch. 275

WROG, Cumberland, Md.	147.28 Km	69 Km.	B
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103.7 MHZ., Ch. 279

WCIR, Beckly, W.V	162.11 Km.	69 Km.	B
WYFY, Fisher, W.V	134.45 Km	31 Km.	A

Third Adjacent Channels: 102.7 MHZ., Ch. 274

WTUS, Mannington, W.V	34.56 Km.	31 Km.	A
WVSR, Charleston, W.V	140.55 Km.	69 Km.	B

103.9 MHZ., Ch. 280

WNMR, New Martinsville, W.V.	51.43 Km	31 Km.	A
WLSW, Scottsdale, Pa.	121.31 Km	31 Km.	A

Intermediate Frequency Channels: 92.5, 92.7 MHZ.

WVHF, Clarksburg, W.V	21.7 Km	10 Km.	A
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*This is a proposal to add a new B-1 channel to Brookville, Pa.: Docket 87-433

TABLE II

Reference Coordinates for New Martinsville, W.V. 39-38-26; 80-51-58

Co-Channel 258, 99.5 MHZ.	Actual	Required	Class of Station
WGAR, Cleveland, Oh.	205.75 Km	178 Km.	B
WJLS, Beckley, W.V.	229.32 Km	178 Km.	B
WBYG, Pt. Pleasant, W.V.	140.33 Km	115 Km.	A

First Adjacent Channels: Ch. 257, 99.3 MHZ

WPQR, Uniontown, Pa.	97.31 Km.	72 Km.	A
WTNS, Coshocton, Oh.	108.22 Km.	72 Km.	A
WDNE, Elkins, W.V.	125.67 Km	72 Km.	A

Ch. 259, 99.7 MHZ.

WSHH, Pittsburgh, Pa.	117.36 Km.	113 Km.	B
WBZX, Columbus, Oh	185.49 Km.	113 Km.	B

Second Adjacent Channels: Ch. 256, 99.1 MHZ.

WHCM, Parkersburg, W.V.	78.54 Km	48 Km.	B-1
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Ch. 260, 99.9 MHZ.

WVAF, Charleston, W.V.	160.35 Km.	69 Km.	B
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Third Adjacent Channels: Ch. 255, 98.9 MHZ.

WKBN, Youngstown, Oh.	158.75 Km	69 Km.	B
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Ch. 261, 100.1 MHZ.

WCLG, Morgantown, W.V.	76.88 Km.	31 Km.	A
WDMX, Vienna, W.V.	64.04 Km	31 Km.	A

The intermediate frequencies are 88.9 and 88.7 MHZ. . no stations are within 20 Km.

TABLE III

Salem Reference Coordinates of 39-17-00; 80-34-00; Salem is in Harrison County, W.V.

Stations within 32 Km. (Class A); 39 Km. (B-1); and 50 Km. (B)

Harrison County:

Bridgeport, W.V.	WDCI, Class A, 23.7 Km.
Clarksburg, W.V.	WVHF, Class A, 21.7 Km.
	WPDX-FM, Class A, 16.36 Km
	WKKW, Class B, 10.97 Km.
Lost Creek, W.V.	WOTR, Class A, 25.68 Km.
Salem, W.V.	WOBG-FM, Class A, 11.7 Km

Clarksburg AM stations WPDX, WHAR, and WOBG will also overlap their city grade contours with this proposal.

Marion County:

Fairmount, W.V.	WFGM, Class B, 45.95 Km
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Lewis County:

Weston, W.V.	WSSN, Class B-1, 35.8 Km
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TABLE IV

New Martinsville, Reference Coordinates 39-38-26, 80-51-58

Stations within 32 Km. (Class A); 39 Km. (B-1), and 50 Km. (B)

Wetzel County:

New Martinsville, W.V.	WNMR	<4 Km	Class A
	WETZ (AM) 1 kw-D	<2 Km.	


Wheeling, W.V., Bellaire, Ohio market; (Belmont County, Ohio and Ohio and Marshall Counties, W.V.):

Bellaire, Oh.	WOMP	43.29 Km.	Class B
Moundsville, W.V.	WRKP	24.92 Km.	Class A
Wheeling, W.V.	WOVK	49.96 Km.	Class B
	WEGW	47.87 Km.	Class B

The 5 mv/m of WWVA (AM-50 KW/U) also would overlap the city-grade of a New Martinsville station on Ch. 258.

CERTIFICATE OF SERVICE

This ~~19th~~ day of August, 1995, a photocopy of the COUNTERPROPOSAL was sent by first class mail, postage prepaid, to the petitioner, Salem-Teikyo University, C/O their attorney, John F. Garziglia, Esq., Pepper and Corazzini, L.L.P., 1776 K Street NW, Suite 200, Washington, D.C. 20006.


Thomas P. Taggart, Attorney for
Seven Ranges Radio Co. Inc.